## REMARKS

This paper is filed in response to the Office Action of September 12, 2007. The date for response extends to December 12, 2007.

Claims 13-26, and 33 were rejected under 35 USC § 102(b), as being anticipated by Bok et al. (Bok) (US 5,601,655). This rejection is respectfully traversed.

Bok is directed toward a system of delivering a fluid to a surface of a substrate with a directional flow. As first noticed, the flow of fluid is directed to one side to influence the flow over a weir 19. The excess fluid is then allowed to drip into the secondary chamber 20. As the wafer is moved, the flow of fluid 16 leaves a film at its trailing edge. In one example, they confirm that fluid will remain on the surface of the substrate, even after the head passes the treatment region. As noted in col. 8, lines 2-18, Bok notes that fluid adheres to the surface 30 *immediately downstream*. Thus, the fluid is not contained between their system applicator and the surface, but is allowed to remain wet, even over regions that the applicator has passed. In one of their teachings, another head 86 (Figure 8) is used to dry the substrate.

To do this, Bok teaches to apply an organic vapor to the fluid, which will then "absorb into the film" that was left behind. From the collective teachings, it is clear that the system does not allow for the removal of fluid of the meniscus. In fact, Bok specifically teachings to (a) apply fluids, (b) rely on forcing the fluid in a direction orientation to allow catching of excess fluids in the weir, and then later (c) adding a separate head with the capabilities of delivering vapor that is absorbed into the film.

It is submitted that the structure of Bok does not teach the elements recited in independent claims 13, 20, or 33. For claim 13, Bok does not teach the plurality of discrete conduits. The delivery by Bok is through a single channel defined by chamber 10. Bok also does not provide any structure, as noted above, which contains the fluid between the applicator and the surface of the substrate. Because this structure is not provided, the fluid is allowed to flow and leave the aforementioned film. Bok does not teach a chamber that houses the proximity head. The Office points to Figure 7, however, this structure is defined to hold one of the heads in a clean room. There is no teaching that the chamber is configured to be supplied with an environmental gas. Thus, the structure of Figure 7 is simply a frame that holds the heads and mechanisms that allow substrates to be proceed, but does not function as a chamber.

The only chamber mentioned by Bok is chamber 10, but that is simply a holding tank for the fluid 16.

In regard to claim 20, Bok does not teach the plurality of discrete conduits. The delivery by Bok is through a single channel defined by chamber 10. Bok does not provide any structure, as noted above, which contains the fluid between the applicator and the surface of the substrate. Because this structure is not provided, the fluid is allowed to flow and leave the aforementioned film. Bok also does not teach the inlet that applies an environmental gas at the leading edge of the proximity head. Bok, on the other hand, in regard vapor 1 (Fig 4), teaches structure that is positioned in the trailing edge. See Col. 8, line 5, that specifically teaches to place structure 3 in the trailing edge, which is opposite of what is claimed. Claim 33 also has similar features, which are not taught by Bok. For at least these reasons, the Office is respectfully requested to withdraw the Section 102 rejection.

Claim 34 was rejected under 35 USC § 103(a) as being unpatentable over Bok in view of Mertens et al. (US 6,491,764). This rejection is respectfully traversed. Bok does not teach treating the top side of the wafer because its system relies on gravity. The fluid must go over a weir, and then drip into chamber 20. Indeed, it is not possible to turn the teachings of Bok upside down, and expect gravity to pull the fluid into the open chamber 20. Consequently, it is respectfully submitted that Bok would not suggest to one skilled in the art, after looking at Mertens, to invert the structure of Bok to achieve a structure that can treat both sides of the substrate.

The '764 patent defines a system that spins, and allows fluids to spread and fly off the edge of the substrate. The structure, although allows for both sides to be sprayed, would not motivate one skilled in the art to combine its teachings to suggest the currently pending claims. As noted above, Bok is missing features and the deficiency in Bok's teachings is not cured by the spinning technique taught by Mertens.

It is also respectfully submitted that the reasoning provided for combination is not supported by rational underpinnings, as required by the Supreme Court's holding in KSR. Specifically, the office puts further that the reason for combining is that it would require previously disclosed parts to be rearranged. Firstly, not all the parts are disclosed, as noted

above. Secondly, the Office has not specified "how" one of skilled in the art would modify the parts to arrive at the claimed invention. For at least these reasons, the Examiner is respectfully requested to withdraw the Section 103 rejections.

In view of the foregoing, the Applicants respectfully request reconsideration and submit that the claims are allowable over the rejection presented by the Office.

In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at **(408) 774-6903**. If any fees are due in connection with the filing of this paper, then the Commissioner is authorized to charge such fees to Deposit Account No. 50-0805 (Order No. LAM2P467).

Respectfully Submitted,
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